

Jorge Alejandro Rojas
Rojas.jorge96@gmail.com
Plaintiff in Pro Se
557 Cambridge Way
Bolingbrook, IL 60440
424-219-1582

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,
Plaintiff,
v.
UNPLUGGED MEDIA, LLC, et al,
Defendants.

Case No. 2:23-cv-02667-AH-KS

**DECLARATION OF JORGE
ALEJANDRO ROJAS IN SUPPORT
OF MOTION FOR DEFAULT
JUDGMENT**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration in support of Plaintiff's Motion for Default Judgment.
3. I am unaware of Defendant Unplugged Media, LLC, ("Unplugged Media") being an infant, incompetent, or an incarcerated person or subject to the Servicemembers Civil Relief Act.

- 1 4. I am unaware of Defendant Alexander Bykhovsky aka Alex Gold (“Bykhovsky”)
2 being an infant, incompetent, or an incarcerated person or subject to the
3 Servicemembers Civil Relief Act.
- 4 5. I am unaware of Defendant Chris Biz Services, LLC (“CBS”) the Texas entity being
5 an infant, incompetent, or an incarcerated person or subject to the Servicemembers
6 Civil Relief Act.
- 7 6. I am unaware of Defendant Chris Biz Services, LLC (“CBS”) the Wyoming entity
8 being an infant, incompetent, or an incarcerated person or subject to the
9 Servicemembers Civil Relief Act.
- 10 7. I am unaware of Defendant Christopher Gutierrez Cuenza aka Chris Cuenza
11 (“Cuenza”) being an infant, incompetent, or an incarcerated person or subject to the
12 Servicemembers Civil Relief Act.
- 13 8. I am unaware of Defendant Alex Gold Holdings, LLC (“AGH”) being an infant,
14 incompetent, or an incarcerated person or subject to the Servicemembers Civil Relief
15 Act.
- 16 9. I have received mailings of filings purportedly made by Bykhovsky which were
17 addressed from Cuenza’s Los Angeles address.
- 18 10. From 1996 to 2014, I resided in Torrance, California, and while I have not resided
19 in Torrance, California since then, I continue to maintain my “in district” 424 area
20 code phone number.
- 21 11. The telephone call identified as Call 1 in the Second Amended Complaint (“SAC”)
22 was made while I was visiting this District and I was physically present in Torrance,
23 CA at the time.
- 24 12. I am unaware of having ever provided any Defendant in this action prior express
25 written consent to contact me.
- 26 13. My telephone number of 424-219-1582 is a cellular, residential, telephone number.
- 27 14. My telephone number of 331-643-6308 is a cellular, residential, telephone number.
- 28

1 15.The telephone calls are described in the SAC, and they accurately describe the events
2 surrounding the calls. I believe that each call was made by the Defendants, for the
3 purpose of solicitation of a service based on the facts surrounding the calls. Although
4 I did not answer each call, I have connected the calls to one another for example
5 using the similar or identical call back numbers and scripts. For each call, I will be
6 able to testify as to how I made the connection between Defendant and the call.

7 16. I made written requests to stop being called to each defendant and those have not
8 been honored.

9 17.I registered the 1582 Line phone number on the Federal Do Not Call Registry on or
10 around January 18, 2008 and it has been registered on the registry continuously since
11 then.

12 18.I registered the 6308 Line phone number on the Federal Do Not Call Registry on or
13 around March 22, 2023 and it has been registered on the registry continuously since
14 then.

15 19.I find telemarketing calls to be frustrating, annoying, and obnoxious, and that they
16 take away from the useful aspects of my day and use of my phone, and that is why I
17 registered my numbers on the do not call registry. I find telemarketing calls to be
18 invasive of my privacy.

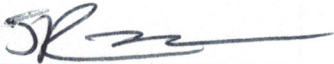
19 20.There were many telephone calls made in this case, and I believe that they were
20 extremely harassing based on the number of times they called, the variety of numbers
21 used, etc.

22 21.Exhibit 2 is a copy of the National Do Not Call Registry confirmation of the
23 registration of my line ending in 1582, which I obtained and printed out from my
24 email, on January 31, 2025.

25 22.Exhibit 3 is a copy of the National Do Not Call Registry confirmation of the
26 registration of my line ending in 6308, which I obtained and printed out from my
27 email, on January 31, 2025.
28

1 23.I attempted to confer with each Defendant consistent with the Local Rules, at least
2 seven days (7) prior to the filing of this motion but did not receive a response.
3

4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
5 and correct. Executed on January 31, 2025, in Bolingbrook, IL.
6

7 

8

Jorge Alejandro Rojas
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28